

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: : CHAPTER 13
: :
Della M. Lawson : No. 19-13854-AMC
Ryan L. Lawson :
Debtors :

ANSWER TO MOTION OF NEW RESIDENTIAL MORTGAGE, LLC.
FOR RELIEF FROM THE AUTOMATIC STAY

Debtors, Della M. And Ryan L. Lawson, by their Attorney
David M. Offen respectfully submit the following:

The debtors admit to missing payments however when they
attempted to make a payment, Movant refused to accept it.
Debtors are requesting the chance to catch up.

WHEREFORE, the Debtors respectfully request that Movant's
Motion be DENIED.

Respectfully submitted,

/s/ David M. Offen
David M. Offen
Attorney for Debtor

Dated: 4/22/20

CERTIFICATE OF SERVICE

The following has been served by electronic mail:

Rebecca Solarz on behalf of New Residential Mortgage, LLC.
bkgroup@kmlawgroup.com

/s/ David M. Offen
David M. Offen
Attorney for Debtor

Dated: 4/22/20